

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

**UNITED STATES OF AMERICA and
COMMONWEALTH OF
MASSACHUSETTS *ex rel.* JULIO
ESCOBAR and CARMEN CORREA**

Relators–Plaintiffs,

v.

**UNIVERSAL HEALTH SERVICES, INC.,
UHS OF DELAWARE, INC., and HRI
CLINICS, INC.**

Defendants.

C.A. No. 11-CV-11170-DPW

JOINT STIPULATION OF DISMISSAL

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, the qui tam provisions of the federal False Claims Act, 31 U.S.C. § 3730(b)(1) and the Massachusetts False Claims Act, M.G.L. c. 12, § 5C(2), and in accordance with the terms and conditions of the July 1, 2020 Settlement Agreement between the Commonwealth of Massachusetts, the United States of America, Relators Julio Escobar and Carmen Correa (collectively, the “Relators”), and Defendants Universal Health Services (“Universal”), UHS of Delaware, Inc. (“UHS-DE”), and HRI Clinics, Inc. (“HRI”) d/b/a Arbour Counseling Services (“Arbour”), the parties to the above-captioned action hereby stipulate to the entry of an order dismissing with prejudice all civil claims asserted by or on behalf of the United States of America, the Commonwealth of Massachusetts and/or the Relators against Defendants for the Covered Conduct as defined in Recital Paragraph E of the Settlement Agreement, including Relators’ claims concerning the payment of attorneys’ fees, costs and expenses pursuant to 31 U.S.C. § 3730(d)(1) and (d)(2) and

M.G.L. c. 12, § 5F. The parties to the associated cases, *United States et al. ex rel. Correa et al. v. Universal Health Services, Inc. et al.*, 17-cv-11843-DPW (“*Correa*”), and *HRI Clinics, Inc. v. Sudders, et al.*, 18-cv-11890-DPW (“*Sudders*”), will likewise be filing stipulations of dismissal soon.

Respectfully submitted,

COMMONWEALTH OF
MASSACHUSETTS

By its attorney,

MAURA HEALEY
Attorney General

Dated: July 21, 2020

/s/ Philip Schreiber
Philip Schreiber (BBO # 667288)
Assistant Attorney General
Medicaid Fraud Division
One Ashburton Place, 18th Floor
Boston, MA 02108
(617) 963-2167
philip.schreiber@mass.gov

UNITED STATES OF AMERICA

By its attorney,

ANDREW E. LELLING
United States Attorney

Dated: July 21, 2020

/s/ Jessica J. Weber
JESSICA J. WEBER
Assistant United States Attorney
United States Attorney’s Office
One Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3303
jessica.j.weber@usdoj.gov

UNIVERSAL HEALTH SERVICES, INC.,
UHS OF DELAWARE, INC., AND HRI
CLINICS, INC.

By their attorneys,

Dated: July 21, 2020

/s/ Katrina C. Rogachevsky
Mark W. Pearlstein (BBO #542064)
Laura McLane (BBO # 644573)
Katrina C. Rogachevsky (BBO #691373)
MCDERMOTT WILL & EMERY LLP
200 Clarendon Street, Floor 58
Boston, Massachusetts 02116
Tel: (617) 535-4000
Fax: (617) 535-3800
mpearlstein@mwe.com
lmclane@mwe.com
krogachevsky@mwe.com

JULIO ESCOBAR &
CARMEN CORREA

By their attorneys,

Dated: July 21, 2020

/s/ Thomas M. Greene
Thomas M. Greene (BBO #210020)
tgreene@greenellp.com
Michael Tabb (BBO #491310)
matabb@greenellp.com
Greene LLP
One Liberty Square, Suite 1200
Boston, MA 02109
(617) 261-0040

CERTIFICATE OF SERVICE

I certify that, on July 21, 2020, this document (filed through the ECF system) will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Katrina C. Rogachevsky
Katrina C. Rogachevsky